IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMSHID NORYIAN (01) a.k.a. JAMES NORYIAN DEHSHID NOURIAN (02) a.k.a. DAVID NOURIAN CHRISTOPHER RYDBERG (03) MICHAEL TABA (07) CRIMINAL NO. 3:17-cr-155-L

THE UNITED STATES OF AMERICA'S OBJECTIONS TO DEFENDANT CHRISTOPHER RYDBERG'S WITNESSES AND EXHIBITS

The United States of America files the following objections to Defendant Christopher Rydberg's Witnesses and Exhibits. (See Dkts. 560, 561.)

I. OBJECTIONS TO WITNESSES

The government has no objections to Defendant Christopher Rydberg's Witness List at this time but reserves the right to object based on testimony adduced at trial. (*See* Dkt. 560.)

II. OBJECTIONS TO EXHIBITS

Defendant Christopher Rydberg filed an Exhibit List adopting all government and co-defendant exhibit lists filed in this case. (*See* Dkt. 573.) In addition to the below, the government incorporates by reference its objections to the other Defendant exhibits in this case and reserves the right to object to any new exhibits offered by Defendant Christopher Rydberg at trial.

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Defense Exhibit No.	Bases for Objections
43–48 (Text Messages)	FRE 402, 403, 602, 802
56 (Plea Agreement Supplement)	FRE 403, 802
57–83 (Email Communications)	FRE 402, 403, 602 802, 901
94 (Device Extraction Report)	FRE 402, 403, 802
101 (Business Card)	FRE 402, 403, 802
102–207 (Email Communications	FRE 402, 403, 602 802, 901
and Credit Application)	FRE 402, 403, 002 802, 701
208 (Device Extraction Report)	FRE 402, 403, 802
216–237 (Handwritten Notes)	FRE 402, 403, 602 802, 901
242–248 (Invoices and Email	EDE (02 902 001
Communications)	FRE 602 802, 901
253–254 (Sample Checks)	FRE 402, 403, 802, 901

III. CONCLUSION

For the foregoing reasons, the government objects to the above-referenced witnesses and exhibits for Defendant Christopher Rydberg.

Respectfully submitted,

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GLENN S. LEON CHIEF, FRAUD SECTION

/s/ Ethan Womble

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